

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
UNITED STATES OF AMERICA

-against-

MILES GUO, KIN MING JE,
and YVETTE WANG,

Defendants.

23 Cr. 118 (AT)

**PETITION PURSUANT TO 21 U.S.C.
§ 853(n) TO ASSERT THIRD-PARTY
INTEREST IN FORFEITED
PROPERTY AND REQUEST
INVESTIGATION**

I, Yongqiang Li, residing in Auckland, New Zealand, submit this petition under penalty of perjury pursuant to 21 U.S.C. § 853(n) to assert my potential legal interest in property subject to forfeiture in the above-captioned case and to request judicial or governmental investigation to determine the extent of my interest.

1. Description of Property

The property at issue may include approximately US\$164, 013 in funds held in one or more bank accounts identified in the Notice of Forfeiture dated February 6, 2025. Due to the complexity of the underlying financial transactions, I cannot confirm the exact location or status of my investments.

2. Nature and Extent of Interest

As a bona fide investor, I transferred the following funds in good faith for the New Zealand Farm Loan Project, G-Clubs membership, and Himalaya Exchange HDO top-ups:

- US\$60,000 on August 5, 2020, to ANZ Bank New Zealand Limited account 263504USD00001, account name “Y J Z,” managed by Xuebing Wang¹, Vognz2020 Limited, for the New Zealand Farm Loan Project.
- US\$50,000 on October 16, 2020 to Signature Bank account 1504005603, managed by G Club Operations LLC, for G-Clubs membership (account ID: 1000640000000030).
- US\$40,000 on March 12, 2021, to Deutsche Bank Trust Company Americas account 00455662, managed by Associated Foreign Exchange, for the New Zealand Farm Loan Project and G-Clubs membership (account ID: 6421640000105132 Ref No. GP2103120541351).
- US\$4,500 on January 11, 2022, to Metropolitan Commercial Bank account 7801000254, managed by Himalaya International Clearing Ltd, for Himalaya Exchange HID XW51MT2 HDO top-ups:

¹ XueBing Wang, a former director of Himalaya New Zealand Eden Farm, so-called a victim of the Defendant, made his statement on s page 74, Case 1:23-cr-00118 Document 477-1.

- US\$2,513 on January 19, 2022, to G-Clubs accounts 1000640000000030 (Order No. UQ2201152256551), via Himalaya Exchange HID XW51MT2 HDO, for annual fees.
- US\$5,000 on April 13, 2022, to Metropolitan Commercial Bank account 7801000254, managed by Himalaya International Clearing Ltd, for Himalaya Exchange HID XW51MT2 HDO top-ups:
- US\$2,000 on July 4, 2022, to G-Clubs accounts 6421640000105132 (Order No. ME2203252352421), via Himalaya Exchange HID XW51MT2 HDO, for annual fees.

Due to third-party management of these investments (e.g., Vognz2020 Limited, G Club Operations LLC, Associated Foreign Exchange, Himalaya International Clearing Ltd), I lack specific knowledge of whether these funds are held in the accounts subject to forfeiture.

3. Basis for Request

I transferred the aforementioned funds in good faith as an investor or buyer, not as a victim of the defendants, and without knowledge of any criminal activity. I never requested a refund or withdrew my investment. This is supported by wire transfer records and investment agreements, which I can provide upon request.

The intricate nature of the financial transactions precludes me from determining whether my investments are part of the forfeited property without further investigation by the Court or the Government.

4. Request for Relief

I respectfully request:

- A hearing pursuant to 21 U.S.C. § 853(n)(4) to adjudicate my potential interest in the forfeited property.
- An investigation by the Court or the United States Attorney's Office to trace my investments and determine if they are part of the forfeited assets. If so, I request amendment of the Notice of Forfeiture to exclude my interest.
- **For privacy and security reasons, redaction of my personal information—including my full address, email, and signature—from any publicly available version of this petition uploaded by the Court.**

Supporting Evidence

Upon request, I will provide wire transfer receipts, investment agreements, and correspondence with the relevant entities to substantiate my good-faith investments.

Declaration

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on April 7, 2025 (NZ Time), at Auckland, New Zealand.

[REDACTED]

Yongqiang Li

[REDACTED]

Filing and Service

This ancillary petition is filed with the Clerk of the Court, United States District Court, Southern District of New York, 500 Pearl Street, Room 120, New York, NY 10007, on April 6, 2025 (US East Time), via NZ Post. A copy has been served on Assistant United States Attorney Ryan Finkel, Jacob K. Javits Federal Building, 26 Federal Plaza, New York, NY 10278, on April 6, 2025 (US East Time), via NZ Post.